

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR 07-0654 CRB
)	
Plaintiff,)	[PROPOSED] STIPULATED
)	ORDER RE: HANDWRITING
v.)	SAMPLES
)	
LINDA ASHIEGBU and EMMANUEL)	
ANYANWU,)	
)	
Defendants.)	

The parties have met and conferred, and have agreed upon the following procedure to provide original handwriting samples to the defense expert, Lloyd Cunningham.

1. The defense expert shall follow the procedures below, shall at all times be responsible for maintaining the highest possible duty of care with regard to the samples;
2. The defense shall identify to the government original handwriting samples that it would like provided to the defense expert;
3. The government shall provide these samples directly to the defense expert;
4. The defense handwriting expert shall maintain control of these original samples at all times, and they shall not be taken out of his laboratory except to be returned to a government agent;
5. Only the defense handwriting expert shall have access to these original handwriting samples during this evaluation period. No other person – including

1 defense counsel or the defendant – shall be permitted access to these original
2 handwriting samples while they are in the custody of the defense handwriting
3 expert;

4 6. The defense expert is permitted to maintain these samples in his laboratory during
5 the period of analysis, not to exceed seven (7) days, and will be permitted to
6 review these samples without government oversight;

7 7. When the expert's evaluation is complete, the expert shall promptly inform the
8 government or a government agent and return the samples directly to the
9 government's control;

10 8. The expert may photograph, scan, and copy the original samples, and may subject
11 the samples to other non-destructive methods of analysis. The expert may not
12 undertake any analysis or experiment that would destroy or alter the original
13 handwriting samples; and

14 9. Upon returning the samples, the defense expert shall certify to the government
15 agent to whom he surrenders the samples that the samples, to his knowledge are in
16 their original condition in all respects. He shall make such certification on a

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JOSEPH P. RUSSONIELLO
United States Attorney

/s/
ALLISON DANNER
Assistant United States Attorney

BARRY F. PORTMAN
Federal Public Defender

/s/
STEVEN G. KALAR
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LLOYD W. CUNNINGHAM

Dated: _____

HON. CHARLES E. BREYER
United States District Court

